

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

Kathryn KNOWLTON, et al,

Plaintiffs,

v.

Case No. 20 CV 01660

CITY OF WAUWATOSA, et. al,

Defendants.

**PLAINTIFF'S CIVIL L. R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

CERTIFICATE OF CONFERRAL

Plaintiffs emailed counsel for Defendants on January 24, 2023 to confer. Defendants oppose the relief requested herein.

ARGUMENT

Plaintiffs Knowlton et. al, by and through their undersigned counsel, E. Milo Schwab, file this expedited motion pursuant to Civil Local Rule 7(h) requesting a seven (7) day extension to file their reply to Defendants' Response to Plaintiff's Motion for Summary Judgment. Defendants Response motion was filed on January 18, 2023. (ECF #283) The Reply, pursuant to local rules, is due on February 1, 2023. As explained to the Court previously, Attorney Motley had some unexpected travel overseas to for an unexpected legal matter involving a client in Qatar. As a result, Plaintiffs' Response to Defendants' Motion for Summary Judgment was extended until January 18, 2023. Responding to both Defendants' Motion for Summary Judgment

and Replying to Defendants' Response on the same day have created a time crunch. Additionally, Plaintiffs need to respond to Defendants' groundless Motion to Strike also filed on January 18, 2023.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant this motion for an extension of time of seven (7) days, or until February 8, 2023, to file our response to Defendants' Response to Motion Summary Judgment.

Dated this 25th day of January 2023.

COUNSEL FOR PLAINTIFFS

Respectfully submitted

/s/ E. Milo Schwab
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